



PRIME XBT

**PRIVACY
POLICY**

Introduction

Any reference to the “PrimeXBT”, the “Company”, “we”, “us”, “our” is a reference to Prime XBT Trading Services Ltd, a company incorporated in the Marshall Islands, with Reg. No.: 120813 and registered office at Trust Company Complex, Ajeltake Road, Ajeltake Island, Majuro, Marshall Islands MH96960.

The importance of maintaining confidentiality and the proper handling of personal data is extremely important to us. We therefore take your privacy seriously when obtaining, processing, and protecting your personal data. This Privacy Policy (the “**Policy**”) outlines how we manage and protect the personal information of our clients.

We want you (the “**User**” and “**Client**”) to understand how and why we process, use, and share your personal information (the “**Personal Data**”) when you use any of our Websites, the Trading Platform, software, applications and other online products and services (collectively the “**Services**”) or when you otherwise interact or communicate with us.

By visiting our Websites, the Trading Platform and, using our services, your agreement and consent to this Privacy Policy is implied.

1. Purpose of collecting Personal Information

1.1. PrimeXBT collects and processes Personal Data necessary for fulfilling our contractual and legal obligations, provided to us directly by you for processing your request for opening a trading account or using any other of our Services.

1.2. If you choose not to provide the information, when we need to fulfil your request for a specific product or service, we may not be able to provide you with the requested product or service.

1.3. We may deliver, personalize, and improve our Services by combining and using the information we have about you (including information we receive on and off our Services) to understand how you use and interact with our Services and the people or things you’re connected to and interested in.

1.4. We may also use the information we have about you for the following purposes:

1.4.1. Provide, maintain, improve, and develop relevant features, content, and Services.

- 1.4.2. Fulfil your requests.
- 1.4.3. Research and develop new services.
- 1.4.4. Detect and defend against fraudulent, abusive, or unlawful activity.
- 1.4.5. We use your location to personalize the content you provide and to serve targeted ads.
- 1.4.6. Research and develop new services.
- 1.4.7. Send you technical notices, updates, security alerts, invoices and other support and administrative messages.
- 1.4.8. Provide customer service.
- 1.4.9. Communicate with you about products, services, offers, promotions, and events, and provide other news and information we think will be of interest to you.
- 1.4.10. Telephone number and address of the wallet can be used for implementation of transactions.
- 1.4.11. The e-mail address can be used to carry out mailings with your consent.
- 1.4.12. Personalize the Services and provide advertisements, content and features that match user profiles or interests.
- 1.5. We collect general anonymous analytical information on the use of the services for their optimization.

2. What Personal Data we Collect and Store

2.1. As part of our business we may collect, use, store and transfer different kinds of personal data about you:

2.1.1. **General information.** The information that we collect includes unique identifiers, browser type and settings, device type and settings, operating system, mobile network information including operator name and phone number and application version number. We also collect information about the interaction of your browsers and devices with our services, including OS, IP address, specifications and the date, time and referrer URL of your request.

2.1.2. **Customer-specific information.** To create an account, you must provide a username, e-mail and password. Furthermore we may request you to provide such information as: Name, Surname and contact details; Date of birth and gender; Information about your income and wealth including details about your assets and liabilities, account balances, trading statements, tax and financial statements; Occupation and employment details; Location data; Knowledge and experience in trading, risk tolerance and risk profile; IP address, device specifications and other information relating to your trading experience;

2.1.3. **Actions you take.** We collect information about the actions you take when using the Services. This include Products you trade with us; historical data about the trades and investments you have made; Your preference for certain types of products and services. It also includes your interactions with other users or projects.

2.1.4. **KYC documents.** In some cases, Anti-money laundering laws require us to sight and record details of certain documents to meet the standards, set under those laws. Identification documentation relevant to the services we provide to you may include:

2.1.4.1. passport;

2.1.4.2. driver's licence;

2.1.4.3. national identity card (if applicable);

2.1.4.4. utility bills;

2.1.4.5. source of funds confirmation;

2.1.4.6. other documents or information we consider necessary to conduct KYC procedure.

2.1.5. **Other information.** You may choose to provide other information directly to us. For example, we may collect information when you request customer support or otherwise communicate with us. You may provide us with the information about your e-mail to receive mailings and to confirm transactions.

2.1.6. **Location information.** We may receive and process information about your location.

2.2. We may receive personal data about you from various third parties and public sources as set out below. Technical Data from the following parties:

2.2.1. analytics providers such as Google based outside the EU.

2.2.2. advertising networks; and

2.2.3. information providers.

3. How we use Cookies

3.1. Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site.

3.2. By visiting PrimeXBT website you are agreeing that we may use cookies for the purposes set out above.

3.3. You can find out more about PrimeXBT use of Cookies in our Cookie Policy available on our Website.

4. How we may use your personal information

4.1. We use information held about you in the following ways:

- 4.1.1. To carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products, and services that you request from us.
- 4.1.2. To provide you with information about other products and services we offer that are similar to those that you have already purchased or enquired about.
- 4.1.3. To provide you, or permit selected third parties to provide you, with information about products or services we feel may interest you.
- 4.1.4. To notify you about changes to our service.
- 4.1.5. To ensure that content on our Website is presented in the most effective manner for you and for your computer.
- 4.1.6. To administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- 4.1.7. To improve our site to ensure that content is presented in the most effective manner for you and for your computer.
- 4.1.8. To allow you to participate in interactive features of our service when you choose to do so.
- 4.1.9. As part of our efforts to keep our site safe and secure.
- 4.1.10. To measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you.
- 4.1.11. To make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them.

5. Disclosure of your personal information

5.1. You agree that we have the right to share your personal information with:

- 5.1.1. Third party apps providers when you use our apps, communication systems and trading platforms which are provided to us by third parties.
- 5.1.2. Service providers and specialist advisers who have been contracted to provide us with services such as administrative, IT, analytics, and online marketing optimization, financial, regulatory, compliance, insurance, research, or other services.
- 5.1.3. Introducing brokers and affiliates with whom we have a mutual relationship.
- 5.1.4. Payment service providers and banks that process your transactions.

5.1.5. Auditors or contractors or other advisers auditing, assisting with or advising on any of our business purposes.

5.1.6. Courts, tribunals, and applicable regulatory authorities as agreed or authorised by law or our agreement with you.

5.1.7. Government bodies and law enforcement agencies wherever and whenever required by law and in response to other legal and regulatory requests.

5.1.8. Any third-party where such disclosure is required in order to enforce or apply our Terms and Conditions or other relevant Agreements and Policies.

5.1.9. Anyone authorised by you.

5.2. We engage service providers to perform functions and provide services to us. For example, we use a variety of third-party services to help operate our services and to help us understand the use of our services, such as Google Analytics. We may share your private personal data with such service providers subject to obligations consistent with this Privacy Policy and any other appropriate confidentiality and security measures, and on the condition that the third parties use your private personal data only on our behalf and pursuant to our instructions. We share your payment information with payment services providers to process payments; prevent, detect, and investigate fraud or other prohibited activities; facilitate dispute resolution such as chargebacks or refunds; and for other purposes associated with the acceptance of credit and debit cards.

5.3. We may partner with third-party advertisers, ad networks to deliver advertising and content targeted to your interests and to better understand your use of the Services. These third parties may collect information sent by your computer, browser, or mobile device in response to a request for content, such as unique identifiers, your IP address, location or other information about your computer or device.

5.4. If you submit personally identifiable information to us through the PrimeXBT Services, then we may use your personal information to operate, maintain, and provide features and functionality of our website, app and another services.

5.5. Other information, that does not personally identify you as an individual is collected by PrimeXBT (such as, by way of example, patterns of use) and is exclusively owned by PrimeXBT can use this information in such manner that PrimXBT, in its sole discretion, deems appropriate.

5.6. We may share specific aggregated, non-personal information with third parties, such as the number of users who have registered with us, the volume and pattern of traffic to and within the website, etc. That information will not identify you, the individual, in any way.

5.7. As were mentioned above, when you send us messages, we can keep them for administering of your inquiries, for improving of our services. We shall not transfer information from such messages to third parties.

5.8. Our websites or our apps may have links to external third-party websites. Please note, however, that third party websites are not covered by this privacy notice and those sites are not subject to our privacy standards and procedures. Please check with each third party as to their privacy practices and procedures.

6. How we store your Personal Data

6.1. We hold personal information in a combination of secure computer storage facilities and paper-based files and other records and take steps to protect the personal information we hold from misuse, loss, unauthorised access, modification or disclosure.

6.2. When we consider that personal information is no longer needed, we will remove any details that will identify you or we will securely destroy the records.

6.3. However, we may need to maintain records for a significant period of time. For example, we are subject to investment services and anti-money laundering laws which require us to retain copies and evidence of the actions taken by us in regard to your identity verification, sources of incomes and wealth, monitoring of your transactions, telephone, chat and email communications, orders and trades history, handling of your complaints and records that can demonstrate that we have acted in line with regulatory code of conduct throughout the business relationship. These records must be maintained for a period of five years after our business relationship with you has ended or even longer if we are asked by our Regulators.

6.4. Personal data provided by you as a prospective client during account opening registration in case the registration was never completed or your account opening application was rejected, will be maintained for six months unless there is a regulatory reason requiring us to keep it for a longer period of time.

6.5. Where you have opted out of receiving marketing communications we will hold your details on our suppression list so that we know you do not want to receive these communications.

6.6. The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (“EEA”). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers or Affiliate companies. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.

6.7. When we transfer your data to other third parties outside the EEA, we may in some cases rely on applicable standard contractual clauses, binding corporate rules, the EU-US Privacy Shield or any other equivalent applicable arrangements.

6.8. If you would like a copy of such arrangements, please contact us using the contact details below.

6.9. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

7. How we protect your Personal Data

7.1. We are committed to safeguarding and protecting personal data and will implement and maintain appropriate technical and organisational measures to ensure a level of security appropriate to protect any personal data provided to us from accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data transmitted, stored or otherwise processed.

7.2. We provide the following safety measures regarding protection of Your Personal Identification (“PI”):

7.2.1. Evaluation of the effectiveness of used security measures, prior to the launch of the website and its updates.

7.2.2. Establishing rules to access to personal data processed by the website, as well as ensuring registration and recording of all actions performed with PI in the information systems of the website.

7.2.3. Detection of the facts of unauthorized access to PI and the adoption of appropriate response measures;

8. Your Data Privacy Rights

8.1. Under the applicable regulatory framework, your data subject rights include the following:

8.1.1. Your right to be informed — You have the right to be informed as to whether we hold any personal data and can request a copy of this information.

8.1.2. Your right of access — You have the right to ask us for copies of your personal information.

8.1.3. Your right to rectification — You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

8.2. Please complete the personal data request by email using the registered email address you disclosed to us, to the following email address:

support@help.primexbt.com.

8.3. We try to respond to all requests within 7 (seven) business days. Occasionally, it may take us longer than 7 (seven) business days if your request is particularly complex or you have made a number of requests.

8.4. We may charge you a reasonable fee when a request is manifestly unfounded, excessive or repetitive, or we receive a request to provide further copies of the same data. In this case we will send you a fee request which you will have to accept prior to us processing your request. Alternatively, we may refuse to comply with your request in these circumstances.

9. Miscellaneous

9.1. If PrimeXBT becomes aware of security systems breach, then we may attempt to notify you electronically so that you can take appropriate protective steps. PrimeXBT may post a notice on our website if the security breach occurs.

9.2. When the personal data breach is likely to result in a high risk to the rights and freedoms of users, PrimeXBT will inform you.

9.3. In the event that PrimeXBT is acquired by or merged with a third party entity, we reserve the right, in any of these circumstances, to transfer or assign the information we have collected from our Users as part of such merger, acquisition, sale, or other change of control. If we become involved in a merger, acquisition, or any form of sale of some or all of its assets, we will notify Users before personal information is transferred and becomes subject to a different privacy policy. In the unlikely event of our bankruptcy, insolvency, reorganization, receivership, or assignment for the benefit of creditors, or the application of laws or equitable principles affecting creditors' rights generally, we may not be able to control how Your personal information is treated, transferred, or used.

10. Changes to our Privacy Policy

10.1. PrimeXBT reserves the right to amend this Policy from time to time. In case there is a material change to this statement, we will inform clients by publishing an updated

version of this Policy on our website. The latest and prevailing version of the Privacy Policy will, at all times, be available at www.primexbt.com.

10.2. PrimeXBT reserves the right to amend this Policy from time to time. For any material changes in the Privacy Policy, we may also notify you via an email to the email address associated with your account. The latest and prevailing version of the Privacy Policy will, at all times, be available at www.primexbt.com

11. Contacting us

11.1. If You have any questions about this Privacy Policy, please feel free to contact us or to write to us at e-mail: support@help.primexbt.com.